

AO 91 (Rev. 11/11) Criminal Complaint

NOV 04 2013

UNITED STATES DISTRICT COURT

for the

District of Maryland

AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND

BY

DEPUTY

United States of America

v.

John Joseph WILSON

Case No.

13-2620 SKG

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 5, 2013 in the county of Harford in the
District of Maryland, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. Section 2114(a)

Assault and robbery of United States Postal employee

18 U.S.C. Section 924(c)

Use of a firearm in relation to a crime of violence

This criminal complaint is based on these facts:

See Affidavit in Support of Criminal Complaint attached hereto.

☒ Continued on the attached sheet.

Jonathan D. Speck
Complainant's signature

Jonathan D. Speck, United States Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.

Date: 11/04/2013

Susan K. Gauvey
Judge's signature

City and state: Baltimore, Maryland

Susan K. Gauvey, United States Magistrate Judge

Printed name and title

NOV 04 2013

AT BALTIMORE
CLERK OF DISTRICT COURT
DISTRICT OF MARYLAND**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT****13-2620 SKG**

BY

DEPUTY

I, Jonathan D. Speck, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a United States Postal Inspector with the United States Postal Inspection Service (USPIS), duly appointed by law and acting as such. I have been employed as a Postal Inspector since June 2005, and am currently assigned to the USPIS - Baltimore (MD) Domicile, External Crimes Team. As part of my primary responsibilities, I investigate violent crimes against the U.S. Postal Service and its employees. These crimes include burglaries, robberies and assaults. In my capacity as a Postal Inspector, I am authorized to obtain and serve federal arrest warrants.

2. Prior to becoming a Postal Inspector, I was employed as a State Trooper with the Maryland State Police (MSP) for approximately eight (8) years. During my tenure with MSP, I worked in uniformed patrol and as a criminal investigator. In my capacity as a criminal investigator, I was tasked with the investigation of violent crimes against the State of Maryland and its citizens. These crimes included attempted murder, aggravated assaults, robberies, and burglaries.

3. This affidavit is based upon your affiant's personal knowledge, information provided by other law enforcement personnel, and evidence obtained during this investigation. The information submitted herein is not all of the information that has been developed during the course of this investigation but is focused to provide sufficient probable cause to support the charges that John J. Wilson committed the armed robbery of the United States Post Office, at 108 Connolly Road, Benson, Maryland, 21018, on

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October 5, 2013, at approximately 9:30 a.m., in violation of Title 18, United States Code, Sections 2114(a) and 924(c).

PROBABLE CAUSE

4. On April 27, 2013, at about 11:30 a.m., Harford County Sheriffs Deputies responded to the United States [Benson] Post Office, located at 108 Connolly Road, Benson, Maryland 21018, in Harford County for a reported armed robbery. The suspect was described as a white male, approximately 6'0" with a muscular build, large lips and clean shaven. He was wearing black sunglasses, green camouflage shirt, green camouflage pants and a hat. The pants were tucked into the boots. He was armed with a small black revolver and brandished it at the clerk before jumping over the counter. He fled on foot after taking ~~\$1,050~~ in U.S. Currency.

5. On October 5, 2013, at about 9:20 a.m., Maryland State Police ("MSP") responded to the same Benson Post Office, for the report of another armed robbery. The suspect in this incident was described as a white male, 6'0"-6'02" and weighing approximately 190 lbs. MSP Forensic Sciences Division processed the location and developed a fingerprint suspected to belong to the robber, which was later matched to John Joseph Wilson, a white male, born in January 1960.

6. On October 9, 2013, MSP obtained an arrest warrant for John J. Wilson, for the armed robbery of the Benson Post Office. Wilson was arrested and interrogated on October 10, 2013. After being advised of his *Miranda* rights by MSP Sgt. J. Kloiber and Sr. Trooper J. Vogt, Wilson voluntarily waived his rights and admitted to committing both the April 27, 2013, and the October 5, 2013, armed robberies of the Benson Post Office. Wilson also admitted to committing or attempting to commit at least thirteen

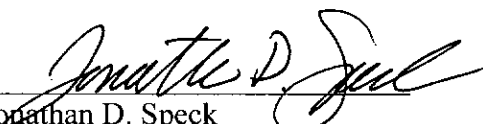
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armed robberies of banks, the Benson Post Office, and commercial establishments in or near Harford County, Maryland, dating back to 2010.

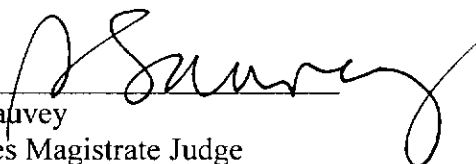
8. Following the interrogation, Wilson lead law enforcement officers to a location in the vicinity of one of the banks he previously robbed, where they recovered a loaded, sawed-off shotgun that matched the physical description of a weapon used in several robberies. Law enforcement officers also recovered a black handgun (revolver) from an automobile Wilson used that also matched the physical description of a weapon used in several other robberies.

7. Based on the aforementioned facts, the undersigned submit that there is probable cause to believe that John Joseph WILSON, a white male, with date of birth in January 1960, has violated Title 18 U.S.C. §§ 2114(a) (assault and robbery of a postal employee) and 924(c) (use of a firearm in relation to a crime of violence).

Your affiant has signed this document under oath and further states that the contents are true and correct to the best of my knowledge.


Jonathan D. Speck
Postal Inspector
United States Postal Inspection Service

Subscribed and sworn before me on November 4, 2013.


Susan K. Gauvey
United States Magistrate Judge

